



Fw: Standard Chlorine Dec 08 Supplemental RIWP

Ed Als to: Angela Carpenter
Cc: Alison Hess, Sarah Flanagan

SDMS Document



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04/06/2010 11:18 AM

see below -

CK just forwarded the DEP's supplemental RI comments to me, and he said in the previous email that he's not going to be issuing them to the PRPs, so I'm assuming at this point that they won't be further directing the PRG in this matter.....

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----- Forwarded by Ed Als/R2/USEPA/US on 04/06/2010 11:17 AM -----

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Date: 04/06/2010 10:46 AM
Subject: **Standard Chlorine Dec 08 Supplemental RIWP**

Here are the comments. NJDEP initially determined that the RIWP was acceptable, however, during review of the IRAW certain data gaps were discovered.



Standard Chlor Dec 08 RIWP Comments for EPA.doc

**Standard Chlorine Chemical Company
December 2008 Supplemental Phase II RIWP
NJDEP Comments**

The following comments were generated during the NJDEP's review of the March 2009 IRAW, Addendum No. 1. Standard Chlorine has proposed to deal with the following comments when revising the Supplemental RIWP.

1. Response to NOD (RTN) 1: The NJDEP has no record of any analytical data having been submitted to the NJDEP in August 2009. However, as the sampling was conducted at risk pending approval of the Supplemental RI Work Plan, it is acceptable to submit these data with the Supplemental RI Report and not with the IRAW Addendum No. 1.

2. RTN 6: The response is not fully acceptable and illogical. The response states that a paper copy of the data deliverables will be provided to the NJDEP upon request, which is what was requested in the NOD. Therefore, as agreed in the response, please submit as requested one paper copy of the data deliverables. However, as the sampling was conducted at risk pending approval of the Supplemental RI Work Plan, it is acceptable to submit the paper copy of the data deliverables with the Supplemental RI Report and not with the final IRAW Addendum No. 1.

3. RTN 7. Section 3: The response is not acceptable. All analytical data from the supplemental RI must be validated in accordance with the previous investigations at these sites. However, as the sampling was conducted at risk pending approval of the Supplemental RI Work Plan, it is acceptable to summarize the results of the data validations in the data reliability section of the Supplemental RI Report with a copy of the formal data validations included in an appendix to that report and not with the final IRAW Addendum No. 1.

4. RTN 8. Section 2 and Table 3-1: The response is not acceptable, as the revised Table 3-1 does not have the vertical locational information for each sample. Table 3-1 was revised to include the ground surface elevation, but the actual individual sample elevations must still be provided in Table 3-1. However, as the sampling was conducted at risk pending approval of the Supplemental RI Work Plan, it is acceptable to include this revision in the Supplemental RI Report and not with the final IRAW Addendum No. 1.

5. RTN 13. Section 3 and Figure 3-1: The response is not clear. It is the NJDEP's interpretation of the response that delineation of potential DNAPL around soil boring location BW-18B is not complete, but further delineation with additional soil borings and sampling along an east-west transect south of BW-18B closer to or over the property line along the railroad tracks will be performed as part of the Supplemental RI Work Plan.